

**United States Bankruptcy Court
District of New Jersey**

Cibik Law, P.C.
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In re: Haydee Velazquez,
Debtor.

Case No.: 23-17261-JNP

Chapter: 13

Hearing Date: January 23, 2024

Judge: Poslusny

**CERTIFICATION OF MICHAEL I. ASSAD IN SUPPORT
OF DEBTOR'S MOTION TO OBJECT TO
POSTPETITION MORTGAGE FEES, EXPENSES, AND
CHARGES BY FREEDOM MORTGAGE CORPORATION**

I, Michael I. Assad, certify as follows:

1. I am counsel for the above debtor.
2. I have reviewed the docket in this case, which indicates that Freedom Mortgage Corporation filed a Statement of Postpetition Mortgage Fees, Expenses, and Charges on December 14, 2023.
3. The notice indicates that Freedom incurred fees as follows: \$550 for objecting to the plan, \$550 for preparing a proof of claim, and \$400 for reviewing the plan.
4. The docket reflects that Freedom filed a 1.5-page objection to the plan on September 12, 2023 (not including three pages for the certificate of service).
5. The docket reflects that Freedom filed a 22-page proof of claim on October 27, 2023.

I certify under penalty of perjury that the above is true and correct to the best of my knowledge, information, and belief.

Date: December 21, 2023

/s/ Michael I. Assad
Michael I. Assad